	Case 4:05-cv-05434-CW	Document 25	Filed 03/13/2007	Page 1 of 2	
1 2 3 4 5 6 7 8	PAMELA Y. PRICE, ESQ. (SPRICE AND ASSOCIATES) The Latham Square Building 1611 Telegraph Avenue, Suit Oakland, CA 94612 Telephone: (510) 452-0292 Facsimile: (510) 452-5625 Attorneys for Plaintiff JOHN CAMPBELL	re 1450	107713) DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA				
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11 12					
13	JOHN EARL CAMPBELL,)	NO. C05-5434 MJJ		
14	Plaintiff,)) PLAINTIFF'S RE-NOTICE OF MOTIO) AND MOTION TO COMPEL		
15	v. NATIONAL PASSENGER RAILROAD		 PRODUCTION OF DOCUMENTS AND ENLARGE TIME FOR NON EXPERT WITNESS DISCOVERY 		
16	CORPORATION dba AMTRA DEELY, and DOES 1-15, incli	AK, JOE)		il 19, 2007 00 a.m. rtroom B, 15 th Floor	
17	Defendants.		TIME: 10:0		
18)) HON. JUDGE MARIA ELENA-JAMES		
19			DISCOVERY CUT	G-OFF: March 23, 2007	
20			TRIAL DATE:	July 23, 2007	
21 22					
23	<u>DISCOVERY MATTER</u>				
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1143FZUUFYF	RE-NOTICE OF MOTION AND MOTION (C05-5434 MJJ (MEJ))				

TO: **DEFENDANTS AND THEIR ATTORNEYS OF RECORD:** 1 2 PLEASE TAKE NOTICE that April 19, 2007 at 10:00, Plaintiff JOHN EARL 3 CAMPBELL (hereinafter "MR. CAMPBELL") will move the Court for an order compelling Defendant NATIONAL PASSENGER RAILROAD CORPORATION ("AMTRAK") to provide 4 5 further discovery responses to Plaintiff's Request for Production of Documents, Set One, forthwith pursuant to the Federal Rules of Civil Procedure, Rules 26, 34 and 37 on the grounds 6 that Defendant AMTRAK's failure to serve a timely and complete response to MR. 7 8 CAMPBELL's written discovery was unreasonable within the meaning and spirit of the Federal Rules and good cause exists for requiring further responses to this discovery because the information is relevant to the subject matter of this dispute and reasonably calculated to lead to 10 the discovery of admissible evidence and to enlarge the time for thirty-five (35) days after the 11 Defendants' further production date for MR. CAMPBELL to complete his discovery. 12 13 This Motion shall be based upon this Notice, the Memorandum of Points and Authorities and the Declaration of Pamela Y. Price, all filed concurrently herewith, the pleadings, 14 15 records and files herein, and upon such other and further matters as may be presented at the time 16 of the hearing. 17 Dated: March 13, 2007 PRICE AND ASSOCIATES 18 19 Pamela Y. Price PAMELA Y. PRICE. Attorneys for Plaintiff 20 JOHN EARL CAMPBELL 21 22 23 24 25 26 27 28

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